

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

UNITED STATES OF AMERICA

INDICTMENT

- v. -

15 CRIM 734

RAYMOND LAMBIS,

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: OCT 27 2015

COUNT ONE

The Grand Jury charges:

1. In or about August 2015, in the Southern District of New York and elsewhere, RAYMOND LAMBIS, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RAYMOND LAMBIS, the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substance that RAYMOND LAMBIS, the defendant, conspired to distribute and possess with the intent to distribute was one kilogram and more of mixtures and

Judge Panley

substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense charged in Count One of this Indictment, RAYMOND LAMBIS, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count One of the Indictment.


Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of RAYMOND LAMBIS, the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United State Code, Section 853.)



FOREPERSON
10/26/2015



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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15 Cr. ____

(21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL

DJ

Foreperson.

*10/27/15 - Filed Indictment
cc Case assigned to J. Pauley
J. Francis
USMA*